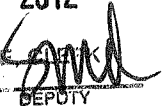


U.S. DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
RECEIVED - SHREVEPORT

OCT 24 2012

TON R. MOORE  
BY  DEPUTY

UNITED STATES DISTRICT COURT

WESTERN DISTRICT OF LOUISIANA

LAFAYETTE DIVISION

UNITED STATES OF AMERICA

\*

CRIMINAL NUMBER : 12-CR-00299

\*

18 U.S.C. § 371

\*

18 U.S.C. § 666

VERSUS

\*

18 U.S.C. § 2

\*

QUINCY RICHARD, SR. (01)

\*

JOHN MILLER (02)

\*

INDICTMENT

THE GRAND JURY CHARGES:

COUNT 1

CONSPIRACY TO COMMIT BRIBERY

18 U.S.C. §§ 371, 666

I. AT ALL TIMES MATERIAL HEREIN:

- A. The St. Landry Parish School Board (SLPSB) consists of thirteen (13) board members. Each member serves a four (4) year term.
- B. John Miller and Quincy Richard Sr. are elected members of SLPSB. As such, Miller and Richard were agents of the SLPSB.
- C. The victim was a candidate for the position of Superintendent of the SLPSB.
- D. The SLPSB advertises, interviews, and selects by majority vote the position of Superintendent of St. Landry Parish Schools (Superintendent).

After an individual is selected to be hired as Superintendent, the SLPSB approves the salary contract of the Superintendent. The final vote to fill the position of Superintendent of the SLPSB was to take place on September 26, 2012.

- E. During the period September 24, 2011 through September 24, 2012 the SLPSB received benefits in excess of \$10,000 under a Federal program involving a grant, contract, subsidy, loan, guarantee, insurance, or other form of federal assistance.

## II. THE CHARGE

From on or about mid July 2012 until on or about September 24, 2012, in the Western District of Louisiana and elsewhere the defendants, John Miller and Quincy Richard, knowingly and willfully conspired, and agreed together, and with each other to commit a crime against the laws of the United States and in particular Title 18, United States Code, Section 666 entitled Theft or Bribery concerning programs receiving Federal Funds, more particularly identified and described in overt acts in furtherance of the conspiracy and to effect the object of the conspiracy as follows:

## III. OVERT ACTS

On September 24, 2012 at The Quarters Casino and Travel Plaza in Opelousas, Louisiana, the defendants, John Miller and Quincy Richard, agents and board members of the St. Landry Parish School Board, corruptly agreed to accept and did in fact accept \$5,000 each from a victim/candidate for the position of Superintendent of the St Landry Parish School Board intending to be influenced and rewarded in

connection with the defendants' votes concerning the position of superintendent of the SLPSB, all in violation of Title 18, United States Code, Section 371. [18 U.S.C. § 371]

**COUNT 2**

**BRIBERY**

18 U.S.C. §§ 666, 2

On or about September 24, 2012, in the Western District of Louisiana, the defendant, John Miller, aided and abetted by defendant Quincy Richard, Sr., agents and board members of the St. Landry Parish School Board, an organization receiving federal assistance in excess of \$10,000 within the one year period before September 24, 2012, corruptly agreed to accept and did in fact accept \$5,000 from a victim/candidate for the position of Superintendent of the St. Landry Parish School Board intending to be influenced and rewarded in connection with the defendants' votes concerning the position of superintendent of the SLPSB, all in violation of Title 18, United States Code, Sections 666, 2. [18 U.S.C. §§ 666, 2]

**COUNT 3**

**BRIBERY**

18 U.S.C. §§ 666, 2

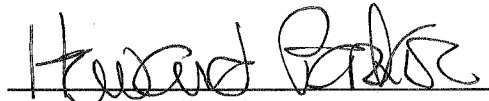
On or about September 24, 2012, in the Western District of Louisiana, the defendant, Quincy ~~Mason~~<sup>Richard</sup> Richard, Sr., aided and abetted by defendant John Miller, agents and board members of the St. Landry Parish School Board, an organization receiving federal assistance in excess of \$10,000 within the one year period before September 24, 2012, corruptly agreed to accept and did in fact accept \$5,000 from a victim/candidate for the position of Superintendent of the St. Landry Parish School

Board intending to be influenced and rewarded in connection with the defendants' votes concerning the position of superintendent of the SLPSB, all in violation of Title 18, United States Code, Sections 666, 2. [18 U.S.C. §§ 666, 2]

A TRUE BILL:

***REDACTED***

STEPHANIE A. FINLEY  
United States Attorney

  
HOWARD C. PARKER, ID: 800008  
Assistant United States Attorney  
800 Lafayette Street, Suite 2200  
Lafayette, Louisiana 70501  
Telephone: 337-262-6618